

## Conduit Evaluation - Remediation/Monitoring Plan Expectations Document

### General Approach

- In 2021, CalGEM shared the conduit evaluation guidance document with operators for potential conduit wells identification. This document provides guidance related to the remediation and/or monitoring plan for identified conduits.
- Potential conduit wells identified inside an area of review (AOR) need to be remediated.
- Potential conduit wells identified outside an AOR may be monitored, with higher-risk wells requiring remediation or plugging on a case-by-case basis.
- Potential conduit wells identified inside an AOR of a UIC project need to be remediated by the operator of that UIC project even if it is not the injection operator's well. Failure to address a potential conduit within an AOR of an active UIC project will result in modification or suspension of the UIC project, in addition to impacting progress on the AE application.
- If an operator responsible for wells identified as potential conduits does not participate in the AE application and does not follow the guidelines outlined above, then that may result in re-defining the proposed AE boundary to exclude the area where unaddressed potential conduit wells are found. In addition, CalGEM will take enforcement action to ensure that the potential conduit is effectively addressed.
- Each operator must provide a spreadsheet that contains the remediation or monitoring action for each potential conduit well the operator is responsible for, including the date to implement the remediation or monitoring action for each well.
- The operator must identify appropriate groundwater monitoring by analyzing shortest distance to the human population, the distance to any water supply wells, and the distance to any private groundwater use. Groundwater monitoring plans should be completed by an individual of responsible charge. Water Code section 10783 may be referenced for discussion of appropriate considerations for a monitoring plan.
- Please refer to the South Belridge Monitoring Plan as an example. The South Belridge Monitoring Plan can be downloaded from the following link - [ HYPERLINK "https://documents.geotracker.waterboards.ca.gov/regulators/deliverable\_documents/7224134147/2021-08-23%20Aera%20Energy%20Risk%20Mitigation%20Monitoring%20plan%20for%20Belridge%20Water%20Disposal.pdf" ]
- The remediation/monitoring plan must include the status of all potential conduit idle wells within CalGEM's idle well management program.
- Operator shall submit the remediation/monitoring plan for CalGEM and the State Water Board and Regional Water Quality Control Board (collectively Water Boards) review.

- After CalGEM & Water Boards concurrence, the operator shall implement the remediation/ monitoring plan.
- Preliminary concurrence to the AE application by Water Board will be provided after the CalGEM and Water Board concur with the remediation/monitoring plan.
- All submittals must be accompanied by a cover letter that includes the following statement, signed, and stamped by a state-registered professional geologist or professional engineer representative of the operator: "I certify that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete."

#### Remediation Approach for potential conduit wells identified inside an AOR

- Plugged conduit wells need to be re-plugged and abandoned.
- Idle conduit wells shall either be remediated and retested or need to be plugged and abandoned.
- Operator must submit a remediation plan and schedule. The schedule may include integration with the Idle well management plan. That means identified potential conduit wells can be prioritized for abandonment with the agreed upon date between Operator(s), CalGEM & Water Boards.

#### Remediation/Monitoring Approach for potential conduit wells identified outside an AOR

- Plugged conduit wells and Idle conduit wells outside an AOR should be remediated similarly to how they would be if inside an AOR. However, monitoring may be considered for these plugged & Idle conduit wells.
- There may be instances where CalGEM/Water Boards may want to move forward with remediation (rather than monitoring) of high-risk conduit wells. This would be evaluated on a case-by-case basis.
- If plugged wells are identified as potential conduit wells with no Idle wells to support monitoring, the operator must propose other alternatives to monitoring such as drilling monitoring wells or converting existing wells to monitoring wells.
- Operator needs to submit a monitoring plan with the implementation schedule.